

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Patricia Kridler, Surviving Widow and Representative of the Estate of David Kridler, deceased		CASE NO. 5:09-cv-02679
		JUDGE DAN AARON POLSTER
Plaintiff,		
v.		
		NOTICE OF INTENTION TO TAKE ORAL DEPOSITION OF THE CORPORATE REPRESENTATIVE(S) OF ASHLAND, INC.
ASHLAND, INC. et al		
Defendants.		

**NOTICE OF INTENTION TO TAKE ORAL DEPOSITION OF THE CORPORATE  
REPRESENTATIVE(S) OF ASHLAND, INC. BY VIDEO CONFERENCE WITH  
SUBPOENA DUCES TECUM**

PLEASE TAKE NOTICE that the Plaintiff shall take the oral deposition of the Corporate Representative(s) of Ashland, Inc. The deposition will be taken pursuant to Rules 26 and 30(B)(6) of the Federal Rules of Civil Procedure beginning at 10:00 a.m. (EST) on May 12, 2010 and continuing from day to day until completed. The deposition will take place at:

Regus Video Conference Center  
545 Metro Place South  
Dublin, OH 43017

The deposition(s) shall be taken before a certified court reporter and videographer from Henjum Goucher Reporting Services, 2501 Oak Lawn Ave., Suite 534, Dallas, Texas 75219, (214)-521-1188.

Ashland, Inc. must designate the person or persons most knowledgeable to fully testify under oath, under the pains and penalties of perjury, on the deponent's behalf concerning the following matters and areas of inquiry:

1. Record retention from 1968 to the present;
2. Sales records from 1968 to the present; and
3. Knowledge of Ashland's sale of products in the state of Ohio.

Please take further notice that deponent is to produce the following materials as set forth on the Subpoena Duces Tecum for copying and inspection. Plaintiff expects deponent to produce said documents included in this Subpoena Duces Tecum 48 hours in advance of his deposition.

Respectfully submitted,

**/s/Christopher Madeksho**

Christopher L. Madeksho *pro hac vice*

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ATTORNEYS FOR PLAINTIFF

### **SUBPOENA DUCES TECUM**

1. A copy of this witness's different curriculum vitae this expert has in the last ten years, including but not limited to, the current curriculum vitae.
2. All documents reviewed by this witness in preparation for his testimony.
3. All documents relied upon by this witness in giving his testimony.
4. A list of prior testimony.
5. Copies of all prior testimony, including exhibits attached thereto.
6. Copies of all sales records from this Defendant to Universal Co-Operatives in Alliance, OH from 1968 to 1975.
7. A written report of all opinions this witness intends to give at trial.

**CERTIFICATE OF SERVICE**

This is to certify that a true and accurate copy of the foregoing has been served this 27<sup>th</sup> day of April, 2010, via E-mail to all Defendants and/or their respective counsel.

**/s/Christopher Madeksho**  
Christopher L. Madeksho *pro hac vice*